## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC.,	)
Plaintiff,	)
v.	) C.A. No. 04-1371-JJ
FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC., and FAIRCHILD	)
SEMICONDUCTOR CORPORATION,	)
Defendants.	)

### **DEFENDANT FAIRCHILD'S PROPOSED VOIR DIRE**

It is Defendant Fairchild's understanding that the Court will conduct standard voir dire in the form appended at Tab A to this document, entitled "Standard Voir Dire." In addition, Fairchild proposes that the jury pool be asked the following specific voir dire questions:

- 1. Have you worked for any company that is involved in the design or manufacture of semiconductors, power converters, or electronic components?
- 2. Do you strongly like or dislike science or technology?
- 3. Do you have any strong opinions on patents or the patent system?
- 4. Have you ever worked for a company that was involved in a patent, copyright, trademark, or trade secret dispute?
- 5. Do you know anyone who is or was employed by the United States Patent and Trademark Office?
- 6. In this case, you will hear questions about whether or not a patent was appropriately issued by the United States Patent Office. Do you have any feelings that would prevent you from invalidating such a patent if the facts and law supported that conclusion?
- 7. Were you acquainted with any of the other members of this jury panel, prior to being called to jury duty?
- 8. In this case, some of the testimony and evidence may be in Korean and will be translated for you into English. Would the fact that the testimony or evidence was originally in Korean or that it was translated into English have any bearing on how you would receive or review that information?
- 9. Are you able to speak, read, or write the Korean language?

#### **ASHBY & GEDDES**

/s/ John G. Day

Steven J. Balick (I.D. #2114) John G. Day (I.D. #2403). Lauren E. Maguire (I.D. #4261) 222 Delaware Avenue, 17<sup>th</sup> Floor P.O. Box 1150 Wilmington, DE 19899 302-654-1888 sbalick@ashby-geddes.com jday@ashby-geddes.com lmaguire@ashby-geddes.com

Attorneys for Defendants

### Of Counsel:

G. Hopkins Guy, III Vickie L. Feeman Bas de Blank Brian H. VanderZanden Orrick, Herrington & Stucliffe LLP 1000 Marsh Road Menlo Park, CA 94025 (650) 614-7400

Dated: May 25, 2006

169855.1

# EXHIBIT A

### **STANDARD VOIR DIRE**

- 1. Judge will read brief description of the case.
  - Is any member of the panel familiar with the case, or has any member of the panel heard or read anything about it?
- 2. Judge will ask counsel to introduce himself or herself. Do you know or have you or has any member of your family had any business dealings with any of the attorneys in their law firms.
- 3. Judge will ask counsel to introduce the parties and name any witnesses they expect to call. Do any members of the panel know the parties or any of the witnesses?
- If you are selected to sit on this case, will you be able to render a verdict solely on 4. the evidence presented at the trial and in the context of the law as I will give it to you in my instructions, disregarding any other ideas, notions, or beliefs about the law that you may have encountered in reaching your verdict?
- 5. Is there any member of the panel who has any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury?
- 6. This case is expected to take \_\_\_\_\_ days to try, so that we expect the testimony in the trial will be completed by \_\_\_\_\_\_. Is there any member of the panel who would be unable to sit as a juror in the case for that period of time?

### Voir dire as submitted by the parties

- A. Up to ten questions from plaintiff. The questions should be designed to elicit a yes or no answer.
- B. Up to ten questions from defendants. The questions should be designed to elicit a yes or no answer.

FINAL QUESTION: Having heard the questions put to you by the court, does any other reason suggest itself to you as to why you could not sit on this jury and render a fair verdict based on the evidence presented to you and in the context of the court's instructions to you on the law?

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of May, 2006, the attached **DEFENDANT** 

FAIRCHILD'S PROPOSED VOIR DIRE was served upon the below-named counsel of

record at the address and in the manner indicated:

William J. Marsden, Jr., Esquire Fish & Richardson, P.C.

919 N. Market Street

**Suite 1100** 

P.O. Box 1114

Wilmington, DE 19899

Frank E. Scherkenbach, Esquire

Fish & Richardson P.C.

225 Franklin Street

Boston, MA 02110-2804

Michael Kane, Esquire

Fish & Richardson P.C.

60 South Sixth Street

3300 Dain Rauscher Plaza

Minneapolis, MN 55402

Howard G. Pollack, Esquire

Fish & Richardson P.C.

500 Arguello Street, Suite 500

Redwood City, CA 94063

HAND DELIVERY

**VIA ELECTRONIC MAIL** 

**VIA ELECTRONIC MAIL** 

**VIA ELECTRONIC MAIL** 

/s/ John G. Day

John G. Day